

FILED

12/12/2023

GMM

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Dec 12, 2023

1:23-cr-00633

Judge Edmond E. Chang

Magistrate Judge Jeffrey Cole

Cat. 2 / Random

UNITED STATES OF AMERICA

v.

TOMMY SPAULDING, a/k/a "Fluid,"
"Big Fluid," and "JT Lurk,"
LAUREN LUCANSKY, a/k/a "Boogie,"
and "Phetish,"
NATHANEL BUTTERFIELD, and
RICHARD MARTINEZ, a/k/a "Radar,"
and "Skore"

Case No.

Violations: Title 21, United States Code,
Sections 841(a)(1) and 846; and Title 18,
United States Code, Section 2

COUNT ONE

The SPECIAL NOVEMBER 2022 GRAND JURY charges:

1. Beginning no later than on or about February 19, 2018, and continuing until on or about February 20, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TOMMY SPAULDING, a/k/a "Fluid," "Big Fluid," and "JT Lurk,"
LAUREN LUCANSKY, a/k/a "Boogie," and "Phetish,"
NATHANEL BUTTERFIELD, and
RICHARD MARTINEZ, a/k/a "Radar," and "Skore,"

defendants herein, did conspire with each other and with others known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; a quantity of a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance; and a

quantity of 3-4 Methylenedioxymethamphetamine ("MDMA"), a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846.

2. With respect to TOMMY SPAULDING, a/k/a "Fluid," "Big Fluid," and "JT Lurk," the offense involved 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; and 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance.

COUNT TWO

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

On or about February 20, 2019, at Chicago, in the Northern District of Illinois, Eastern Division,

TOMMY SPAULDING, a/k/a “Fluid,” “Big Fluid,” and “JT Lurk,” defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; and a quantity of a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT THREE

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

On or about November 12, 2019, at Chicago, in the Northern District of Illinois,
Eastern Division,

LAUREN LUCANSKY, a/k/a "Boogie," and "Phetish,"
defendant herein, did knowingly and intentionally distribute a controlled substance,
namely, a quantity of a mixture and substance containing a detectable amount of
heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2022 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841 and 846, as set forth in this Indictment, defendant shall forfeit to the United States of America any property which constitutes and is derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property used, and intended to be used, in any manner and part, to commit and facilitate commission of the offense, as provided in Title 21, United States Code, Section 853(a).

2. If any of the property described above, as a result of any act or omission by a defendant cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

Signed by Erika Csicsila on behalf of the
ACTING UNITED STATES ATTORNEY